

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

Case 1:21 -CV-10981-WGY

George Artem

Plaintiff

-v-

New England Law | Boston, Scott Brown in his
official capacity as President and Dean

Defendant(s)

MOTION TO STRIKE

I. Motion

Plaintiff, Mr. George Artem, respectfully requests the Court to strike the footnotes from defendants' motion to dismiss and associated memoranda related to Mr. Artem's past pro se litigation (Dkt. 12, 13). Mr. Artem's past pro se litigation has no factual or legal bearing whatsoever with relation to the subject matter of the cause before the Court. Not only is the material in these footnotes wholly immaterial and impertinent, defendants' characterizations of the litigation serve only to smear the reputation of the plaintiff before the Court.

II. Certification

I certify, pursuant to L.R. 7.1, that I have in good faith conferred and attempted to narrow the issues pertaining to this motion with defendants' counsel.

III. Conclusion

For the foregoing reasons, the Court should strike defendants' footnotes related to plaintiff's past pro se litigation (Dkt. 12, 13) pursuant to Fed. R. Civ. P. 12(f).

Respectfully Submitted,

July 8th, 2021

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George Artem

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CERTIFICATE OF SERVICE

I certify that on the 8th day of July 2021, service was made of a copy of the foregoing document by e-mail on defendants' counsel Walter B. Prince (wprince@princelobel.com), Daniel S. Tarlow (dtarlow@princelobel.com), Laurie F. Rubin (lrubin@princelobel.com) and Michael Thompson (mthompson@princelobel.com) at PRINCE LOBEL TYE LLP One International Place, Suite 3700 Boston, Massachusetts 02110.

July 8th, 2021

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